



March 21, 2003

EX PARTE – VIA ELECTRONIC FILING

John B. Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

David H. Solomon, Bureau Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CC Docket No. 94-102

Dear Messrs. Muleta and Solomon:

T-Mobile USA, Inc (“T-Mobile”) is writing to notify the Commission that, after carefully reviewing the current status of available Automatic Location Identification (“ALI”) technologies, T-Mobile has decided to implement a network-based Time Difference of Arrival (“TDOA”) system as its E911 Phase II solution, rather than continuing to implement Enhanced Observed Time Difference of Arrival (“E-OTD”). T-Mobile has made this decision after considering a number of factors. These include the practical likelihood of continued strong vendor commitment to implement and upgrade E-OTD to meet the October 2003 accuracy standard given the decisions of both AT&T Wireless and Cingular Wireless to shift away from E-OTD for their GSM networks, the likelihood that those decisions by AT&T Wireless and Cingular Wireless will draw vendor time and resources away from further E-OTD development, and the Commission’s imperative that carriers deploying handset solutions achieve 95% penetration of location-capable handsets throughout their customer base by December 2005.

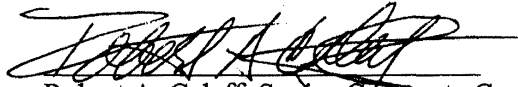
This was not an easy decision for T-Mobile. Unlike the other two nationwide carriers using the GSM air interface, T-Mobile relies on GSM exclusively and therefore cannot leverage ALI technology deployments for other air interfaces. Additionally, T-Mobile had to weigh the difficulties of changing Phase II technologies in mid-stream, after devoting substantial time and effort to E-OTD development, and delivering Phase II E-OTD service to a number of PSAPs. However, T-Mobile’s decision reflects its recognition of the practical difficulties of being the only nationwide carrier pursuing E-OTD, including the ramifications for future vendor support and development, and the consequent uncertainty surrounding the ability to refine further the accuracy of E-OTD technology consistent with the Commission’s timelines. T-Mobile also

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recognized the challenge of achieving 95% handset penetration by December 31, 2005 for handset based solutions, given the slower than expected pace of development of ALI technologies.

T-Mobile will not immediately discontinue E-OTD Phase II service in those areas where it has been deployed and implemented. A transition for those areas will be part of T-Mobile's TDOA deployment plan. That deployment plan is still under development.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Calaff", written over a horizontal line.

Robert A. Calaff, Senior Corporate Counsel
Governmental and Industry Affairs
401 9th Street, N.W.
Suite 550
Washington, D.C. 20004
(202) 654-5900